November 20, 2014

**Via Email**

U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460
Attn: Rebecca Edelstein and Peter Gimlin

RIN: 2070-AJ38

Re: Polychlorinated Biphenyls (PCBs); Reassessment of Use Authorizations

Dear Ms. Edelstein and Mr. Gimlin:

The Interstate Natural Gas Association of America (INGAA) thanks the U.S. Environmental Protection Agency (EPA) for providing an update to our members on the status of EPA's reassessment of the existing use authorizations set forth in the PCB Mega Rule. The information that you provided during our call on October 1, 2014 was instructive. INGAA appreciates the open dialogue that our industry has had with EPA, and looks forward to maintaining this open dialogue in the future. As agreed, INGAA is sending this follow-up letter to confirm and clarify several points.

During the call, you stated that EPA does not intend to change the 50 ppm standard and intends to maintain the existing use authorizations at the present time, but is considering changes to the following: natural gas pipeline facilities, porous surfaces, and electrical equipment and fluorescent light ballasts.

**Natural Gas Pipeline Facilities**

EPA is considering requiring notification to end users if PCBs are discovered in customer meters, emphasizing that customer meters are meters located at residential dwellings and public buildings, not meters at industrial interconnects. EPA indicated that it would clarify in the proposed rulemaking that such notification is limited to end user locations, and is not required for industrial interconnects.

EPA is also considering a reporting requirement if PCBs are discovered in pipeline liquids at or above 50 ppm as part of the compliance monitoring program. It is our understanding that operators would be required to report PCBs that are discovered as part of the annual sampling

requirements in the regulated sections of the pipeline system, and not samples from waste disposal characterization. EPA stated that the purpose of this proposed new reporting mandate is to allow EPA to track industry's progress in removing PCBs from the system. EPA indicated that it is not certain of the method of reporting, but stated that it is considering some form of annual reporting. INGAA suggests that for purposes of efficiency, any annual reporting should be linked to or replace the Annual PCB Document Log that is due on July 1 each year.

EPA is also considering requiring operators to demonstrate that there is no evidence of PCB contamination in any pre-1978 compressor engines. EPA indicated that it may require sampling of pre-1978 engines or may allow operators to submit historical data demonstrating that there is no contamination. INGAA requests that EPA allow operators to submit reasonable historical data to demonstrate compliance.

Finally, EPA is considering allowing operators to rely on wipe samples, if liquid samples are not available, to establish that a segment of the pipeline system that has previously been regulated should be deregulated. Given that so many portions of the system are dry, INGAA supports this proposal, so long as the wipe samples are not used to classify a line which is not regulated under the rule.

**Porous Surfaces**

EPA indicated that it is considering various proposals, including doing nothing, implementing deed restrictions, requiring an operator to take steps to address contaminated porous surfaces if the operator abandons the facility, or limiting this use authorization to low occupancy areas.

The porous surface use authorization applies to many industries, including the natural gas transmission sector. INGAA is concerned that any reassessment of the porous surface use authorization, particularly any reassessment that is intended to address other industries, may have unintended negative consequences for the transmission industry. Specifically, INGAA states that limiting this use authorization to low occupancy areas is not realistic. Any contaminated porous surfaces that may be located at transmission facilities are secure, fenced and not open to the general public. Given the various locations of transmission facilities and the nature of the operations, it is not feasible to limit this use authorization to low occupancy areas.

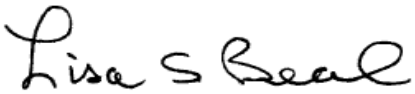
**Electrical Equipment and Fluorescent Light Ballasts**

EPA indicated that it is considering phasing out fluorescent light ballasts, capacitors and other small electrical equipment over a three-year period. While INGAA understands EPA's desire to phase out this equipment, INGAA believes that a three-year plan is not realistic, but would support a 10-year phase-out plan as is being considered for transformers. INGAA also believes that the phase-out should be limited to known equipment. Operators should not be required to investigate all electrical equipment to ascertain whether they contain PCBs. An

operator should only be required to remove the light ballasts and other electrical equipment upon discovery.

INGAA is happy to meet with EPA and discuss these issues at your convenience. Should you have any questions or if you would like to follow up, please contact me at (202) 216-5935 or at lbeal@ingaa.org.

Sincerely,



Lisa S. Beal
Vice-President, Environment and Construction Policy

Cc: PCB Task Force